

Dept. #

Assigned

Stern ORIGINAL

FILED
Superior Court Of California
County Of Los Angeles

AUG 23 2018

Sherrill R. ... Clerk of Court
By *[Signature]* Deputy
Glortetta Robinson

DAVID HOFFMAN, ESQ., SBN 140557
DAVID HOFFMAN, A Professional Corporation
21800 Oxnard Street, Suite 430
Woodland Hills, CA 91367
Phone: (818) 346-3001; (310) 286-1000
Fax: (818) 346-3011
Attorneys for Petitioner, MICHAEL BROWN

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

MICHAEL BROWN,

Petitioner,

vs.

CITY OF LOS ANGELES, and DOES ONE
through 25,

Respondents.

Case No.:

BC 7 19 16 2

[Civil Unlimited Jurisdiction]

**VERIFIED COMPLAINT FOR
DECLARATORY RELIEF; CALIFORNIA
PUBLIC RECORDS ACT COMPLIANCE**

CIT/CASE: BC719162
LEA/DEF#:

RECEIPT #: CCH505376124
DATE PAID: 08/23/18 05:24 PM
PAYMENT: \$435.00 310
RECEIVED:
CHECK: \$435.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$0.00

Plaintiff, **MICHAEL BROWN**, alleges as follows:

FIRST CAUSE OF ACTION

DECLARATORY RELIEF

(California Pub. Records Act Compliance against Respondents)

1. Michael Brown is a natural person and member of the public, resident in the County of Los Angeles, State of California. Petitioner is and has been a registered golf instructor at Woodley Lakes golf course for many years.

2. The City of Los Angeles, the respondent herein, and its various departments and divisions including the City Attorney's Office, the Department of Recreation and Parks, and its Golf

1 Division are "public agencies," and/or "local agencies," subject to and regulated by the California Pub.
2 Records Act, Government Code §§6250, et seq.

3 3. The true names and capacities, whether individual, corporate, associate or otherwise of
4 defendants/respondents, Does One through 25, inclusive, are unknown to the Petitioner at this time, who
5 therefore sues said defendants by such fictitious names. Petitioner is informed and believes and thereon
6 alleges that each of the Respondents designated herein as a Doe is responsible in some manner and
7 liable and/or subject to the Court's jurisdiction by way of failing to conform to or comply with the
8 California Pub. Records Act, and in such other manner or by other (wrongful) conduct, proximately
9 caused the injury and harm alleged in this complaint for declaratory relief.

10 4. At all times herein alleged, Respondents, and each of them, whether specifically named
11 or designated herein as a Doe, were the agents, servants, employees, consultants, partners and associates
12 or otherwise legally liable participants with each and every other defendant in doing the things alleged
13 herein, including withholding public records and documents, and were acting within the course and
14 scope of their authority as agents, servants, employees and co-conspirators, acting with the authority,
15 consent, ratification and permission of the other respondents, and each of them.

16 5. At all times alleged herein, Petitioner pursued a request for writings and other
17 information from the Respondents, and a true and correct copy of said request of June 20, 2018, is
18 attached hereto as **Exhibit 1** and incorporated herein by this reference. Said request was made to the Los
19 Angeles City Attorney's Office and the Department of Recreation and Parks, City of Los Angeles, Golf
20 Division [221 N. Figueroa St., Suite 350, Los Angeles, CA 90012] sought, "any writing... In a tangible
21 format emanating from or directed to the Golf Division of the Department of Recreation and Parks in the
22 last three years (2015-2018, inclusive) that embodies, refers or relates to: ¶ (1) Liability insurance for
23 golf instructors on city golf courses; ¶ (2) Signs and signage for golf instructors; ¶ (3) Complaints and
24 criticisms to, from or about golf instructors at Woodley Lakes golf course in Van Nuys." Petitioner
25 enclosed a check (Hoffman Law General Account, #30026) to defray expenses (<\$100) and sought
26 "specific policies and procedures for California Pub. Records Act requests," "if there are any specific
27 policies and procedures." Website links were also requested.

28 ///

1 6. Attached to this Petition as **Exhibit 2** is a true and correct copy of a July 17, 2018, letter
2 request which is respectfully incorporated by this reference. Said correspondence notified the
3 respondents they were in violation of Government Code §6253 and on notice that petitioner would seek
4 relief pursuant to Government Code §6259.

5 7. The Los Angeles City Attorney's Office communicated it had complied with the
6 requested information by claiming no documentation existed and a true and correct copy of its July 2,
7 2018, response is appended hereto as **Exhibit 3**.

8 8. Petitioner responded to the Los Angeles City Attorney's Office that proceedings would
9 be instituted to compel production of a lawful response and production of all illegally withheld records
10 and documents from the Golf Division and that the City Attorney's Office was not exempt from the
11 Court's mandate or order because it was the attorney-in-fact for the Golf Division. A true and correct
12 copy of the July 20, 2018, email correspondence is appended hereto as **Exhibit 4**.

13 9. Petitioner has not received any cooperation or compliance as of the filing of this
14 complaint for declaratory relief, and a justiciable case and controversy has arisen over the petitioner's
15 right to public records that are being improperly withheld by the respondents. This court has jurisdiction
16 and may compel compliance with petitioner's demand or any variation thereof pursuant to Government
17 Code §6259, issue a citation for contempt and order attorney's fees and costs.

18 10. Petitioner has hired and retained counsel for purposes of pursuing this records request
19 and has incurred attorney's fees and costs in compelling compliance with the California Pub. Records
20 Act.

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1 **WHEREFORE**, petitioner prays this Court,

2 (1) Issue an order under the California Pub. Records Act compelling the respondents to
3 produce all responsive public records in its possession, custody and control to the Clerk of the Court;
4 and,

5 (2) Issue an order for an *in camera* inspection of all materials and public records the Court
6 orders produced; and,


7 (3) Order the requested records to be made public and delivered in a tangible format to the
8 petitioner; and,

9 (4) Order reasonable attorney's fees and costs in favor of the petitioner and against the
10 respondents; and,

11 (5) Such other and further relief, including any amendments, as the Court may deem just and
12 proper.


13
14 DATED: August 13, 2018

Respectfully submitted,
DAVID HOFFMAN, A Professional Corporation

15
16
17 By: 
18 ~~DAVID HOFFMAN, ESQ., Attorney for Petitioner,~~
MICHAEL BROWN

[illegible]

1. I am licensed to practice law before all the state courts in California, and I am counsel for Michael Brown, the complainant herein. I have superior personal knowledge of the facts and circumstances alleged in the complaint for declaratory relief, *ante*, and verify it as counsel for Mr. Brown. The facts alleged in this complaint are true.



DAVID HOFFMAN, ESQ., Declarant

08/24/2018

Ex: 1

21800 OXNARD STREET
SUITE 430
WOODLAND HILLS, CA 91367

Law Offices of
DAVID HOFFMAN
A PROFESSIONAL CORPORATION

TELEPHONE (818)346-3001
FACSIMILE (818)346-3011

E-MAIL

DHoffman@HoffmanLawCorp.com

DAVID HOFFMAN
Lawyer
DELETA DRUMMER
Lawyer

June 20, 2018

Department of Recreation and Parks
City of Los Angeles
221 N. Figueroa Street, Suite 350
Los Angeles, CA 90012
(213) 202-2633 Phone
(213) 202-2614 Fax

Los Angeles City Attorney's Office
200 N Main Street, Suite 800
Los Angeles, CA 90012
(213) 978-8100

Re: California Pub. Records Act Request (Government Code §§6250, et seq.)

Dear Sir or Madam:

Please be advised that this is a records and communications request pursuant to the California Public Records Act, Government Code §§6250, et seq., and we are hereby requesting any writing as defined by California Evidence Code §250, including, but not limited to any communication in a tangible format emanating from or directed to the Golf Division of the Department of Recreation and Parks in the last three years (2015-2018, inclusive) that embodies, refers or relates to:

- (1) Liability insurance for golf instructors on city golf courses;
- (2) Signs and signage for golf instructors;
- (3) Complaints and criticisms to, from or about golf instructors at Woodley Lakes Golf Course in Van Nuys.

Please find, enclosed, our check to defray expenses incurred in an amount not stated but not more than \$100, as you are permitted to insert. If expenses are more than this stated sum, please contact us and we will augment with another check immediately.

In addition, if there are any specific policies and procedures for California Public Records Act requests, please furnish that information including any website links for those purposes.

06/24/2018

EX1

Department of Parks and Recreation
Los Angeles City Attorney's Office
Re: California Pub. Records Act Request (Government Code §§6250, et seq.)
June 20, 2018
Page 2 of 2

Thank you in advance for your courtesy and consideration as well as your timely response.

Very truly yours,

Law Offices of
DAVID HOFFMAN
A Professional Corporation

By: 

DAVID HOFFMAN, ESQ.

DH:dd

Enclosure(s): Check No. 30026 – Not to Exceed \$100
C:/deptofparks.cityattorneysoffice2018.jun

06/24/2018

08/24/2018

Ex. 2

21800 OXNARD STREET
SUITE 430
WOODLAND HILLS, CA 91367

Law Offices of
DAVID HOFFMAN
A PROFESSIONAL CORPORATION

TELEPHONE (818)346-3001
FACSIMILE (818)346-3011

E-MAIL

DHoffman@HoffmanLawCorp.com

DAVID HOFFMAN
Lawyer
DELETA DRUMMER
Lawyer

July 17, 2018

VIA FACSIMILE AND MAIL

Department of Recreation and Parks
City of Los Angeles
Golf Division
221 N. Figueroa Street, Suite 350
Los Angeles, CA 90012
(213) 202-2633 Phone
(213) 202-2614 Fax

Los Angeles City Attorney's Office
200 N Main Street, Suite 800
Los Angeles, CA 90012
(213) 978-8100 Phone
(213) 978-8312 Fax

Re: California Pub. Records Act Request (Government Code §§6250, et seq.)

Dear Sir or Madam:

Reference is made to my letter of June 20, 2018 making a California Pub. Records Act request on behalf of my client, Michael Brown, a golf instructor at the Woodley Lakes Golf Course in Van Nuys.

You are in violation of Government Code §6253 for failing to respond to our request. Unless you comply with the law, action will be taken to enforce the requirements of this Act. See Government Code §6259.

Thank you for your immediate attention to this matter.

Very truly yours,

Law Offices of
DAVID HOFFMAN
A Professional Corporation

By:

DAVID HOFFMAN, ESQ.

08/24/2018

DH:dd
C:/deptofparks.cityattorneysoffice1718.jul

EX2

BLUEBIRDOnline.com (888) 477-0700

08/24/2018

This email and its attachments are intended to be privileged and confidential for the intended recipient. If you received this in error, please assist by sending a reply with "ERROR" in the subject box and then delete the email with any attachments. We regret any inconvenience and appreciate your courtesy.

GO YANKEES! GO UCLA BRUINS! GO DALLAS COWBOYS! GO THIMSHA TIGERS TRACK! GO CAALA!

From: Mike Dundas
Sent: Friday, July 20, 2018 11:45 AM
To: DHoffman@hoffmanlawcorp.com
Cc: Cordero, Frank
Subject: Fwd: CPRA for records concerning golf instructors

Mr Hoffman,

The City Attorney's Office is in receipt of your letter dated July 17, 2018 wherein you state that our office failed to respond to your prior CPRA request. That is incorrect. For your records, I am reforwarding the email sent by our office on July 2, 2018 indicating that we have no responsive records. See that email below.

Mike Dundas
Deputy City Attorney

----- Forwarded message -----

From: **Strefan Fauble** <strefan.fauble@lacity.org>
Date: Mon, Jul 2, 2018 at 5:34 PM
Subject: CPRA for records concerning golf instructors
To: DHoffman@hoffmanlawcorp.com
Cc: Frank Cordero <frank.cordero@lacity.org>

Mr. Hoffman,

This letter is in response to your request, received by the Los Angeles City Attorney's Office via U.S. Mail on June 26, 2018, and attached to this email, seeking records pertaining to golf instructors, pursuant to the California Public Records Act (CPRA).

Please be advised that my Office has no responsive records. I see that your letter was also addressed to the City's Department of Recreation and Parks. I am confident that they will be able to satisfy your CPRA request with records providing some or all of the information you seek.

--
Strefan Fauble
Deputy City Attorney III

*****Confidentiality Notice *****

This electronic message transmission contains information from the Office of the Los Angeles City Attorney, which may be confidential or protected by the attorney-client privilege and/or the work product doctrine. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the content of this information is prohibited. If you have received this communication in error, please notify us immediately by e-mail and delete the original message and any attachments without reading or saving in any manner.

06/24/2018

EX3

BLUEBIRDOnline.com (888) 477-0700



08/24/2018

Fwd: Fw: CPRA for records concerning golf instructors

From: ddrummer@hoffmanlawcorp.com

Date: 08/13/2018 01:30PM

To: ddrummer@hoffmanlawcorp.com

From: dhoffman@hoffmanlawcorp.com

Sent: Friday, July 20, 2018 11:54 AM

To: Mike Dundas

Cc: Cordero, Frank ; Deleta Drummer

Subject: Re: Fwd: CPRA for records concerning golf instructors

Mike, I would be obliged if you would copy my associate on all comms.

While you are correct that you responded that the City Attorney's office did not have documents, you also noted the Department of Recreation and Parks would provide a response, and it has not.

I cannot say whether there is a (legal) distinction to be made between a right and left hand for the City, which is why I have and will continue to copy the City Attorney regarding comms with its own Department of Rec & Parks.

Keeping true to the metaphor, I also believe your left hand needs a kick in your buttock, which conjures up some pretty interesting imagery, to respond to a lawful request.

Anyway, if you know of authority that says the City Attorney for the City's Department should not be copied on CPRA requests and petitions or that it's not a proper party when I file, please help me out. By the same token I am preparing a superior court petition because nothing has come of my entreaties. I'm available to you at 310-850-0233. I mean no harm or a pain, but your compatriots are holding us up.

Thank you, David

David Hoffman, Esq., Cal. Bar 140557

DHoffman@HoffmanLawCorp.com

Law Offices of David Hoffman, A Professional Corporation

5 Warner Center

21800 Oxnard Street, Suite 430

Woodland Hills, CA 91367

P: (818) 346-3001 (310) 286-1000

F: (818) 346-3011

08/24/2018

EX4

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Deputy City Attorney

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--
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Deputy City Attorney III

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): DAVID HOFFMAN, ESQ. SBN 140557 LAW OFFICES OF DAVID HOFFMAN, APC 21800 OXNARD STREET, SUITE 430 WOODLAND HILLS, CA 91367 TELEPHONE NO.: 818-346-3001 FAX NO.: 818-346-3011 ATTORNEY FOR (Name): Petitioner, Michael Brown		FOR COURT USE ONLY <div style="text-align: center;"> FILED Superior Court of California County of Los Angeles </div> <div style="text-align: center; font-size: 1.2em;"> AUG 23 2018 </div> <div style="text-align: center;"> Sheriff's Office Deputy Christina Robinson </div>	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 N HILL STREET MAILING ADDRESS: 111 N HILL STREET CITY AND ZIP CODE: LOS ANGELES, CA 90012 BRANCH NAME: CENTRAL DISTRICT		CASE NUMBER: <div style="font-size: 1.5em; font-weight: bold;"> BC 7 19 16 2 </div>	
CASE NAME: MICHAEL BROWN v. CITY OF LOS ANGELES			
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)		Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	
JUDGE:		DEPT:	

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:		
Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input checked="" type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. ☐ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☐ punitive
4. Number of causes of action (specify): **1**
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: August 13, 2018
 DAVID HOFFMAN, ESQ.

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

SHORT TITLE: Michael Brown v. City of Los Angeles

CASE NUMBER

**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL 1 ☒ HOURS/ ☐ DAYS

Item II. Indicate the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

Step 3: In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

- | | |
|--|--|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, central district. | 6. Location of property or permanently garaged vehicle. |
| 2. May be filed in central (other county, or no bodily injury/property damage). | 7. Location where petitioner resides. |
| 3. Location where cause of action arose. | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred. | 9. Location where one or more of the parties reside. |
| 5. Location where performance required or defendant resides. | 10. Location of Labor Commissioner Office |

Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/ Property Damage/ Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4. 1., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 4.
		<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1., 3.
		<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4.

08/24/2011

SHORT TITLE: Michael Brown v. City of Los Angeles	CASE NUMBER
--	-------------

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
	Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Employment	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
	Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	1., 2., 3., 5.
		<input type="checkbox"/> A6031 Tortious Interference	1., 2., 3., 5.
		<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 8.
Real Property	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels_____	2.
	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2., 6.
		<input type="checkbox"/> A6032 Quiet Title	2., 6.
<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)		2., 6.	
Unlawful Detainer	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
	Unlawful Detainer-Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

SHORT TITLE:

Michael Brown v. City of Los Angeles

CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above		
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.		
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.		
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.		
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.		
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.		
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.		
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.		
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.		
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.		
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.		
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.		
	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.		
	Miscellaneous Civil Complaints	Other Complaints (Not Specified Above) (42)	<input checked="" type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.	
		Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.	
		Miscellaneous Civil Petitions	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

SHORT TITLE:

Michael Brown v. City of Los Angeles

CASE NUMBER

Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			ADDRESS: 221 N. Figueroa Street
CITY: Los Angeles	STATE: CA	ZIP CODE: 90012	

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: August 13, 2018

(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

08/24/2018